

EXHIBIT 14

TO MAO DECLARATION ISO PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

4 CHASOM BROWN, WILLIAM BYATT,) Case No.
5 JEREMY DAVIS, CHRISTOPHER) 5:20-cv-03664-LHK-
6 CASTILLO, and MONIQUE TRUJILLO) SVK
individually and on behalf of)
all other similarly situated,)
)
7 Plaintiffs,)
)
8 vs.)
)
9 GOOGLE LLC,)
)
10 Defendant.)
=====)

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED
DEPOSITION OF MONIQUE TRUJILLO

Friday, February 11, 2022

Remotely Testifying from Los Angeles, California

Reported By:

Hanna Kim, CLR, CSR No. 13083

Job No. 5077549

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Plaintiffs,)
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GOOGLE LLC,)
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Defendant.)
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Virtual videoconference video-recorded deposition of MONIQUE TRUJILLO, remotely testifying from Los Angeles, California, taken on behalf of the Defendant, on Friday, February 11, 2022, before Hanna Kim, CLR, CSR No. 13083.

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1 A. No, I have not.

2 Q. Okay. Ms. Trujillo, is web privacy
3 important to you?

4 A. Yes, it is.

5 Q. How important, would you say? 09:49:22

6 A. Extremely important.

7 Q. Why is that?

8 A. Because it's my choice of what I want to
9 have seen openly and privately -- or privately.

10 Q. And what do you mean by, it's your choice 09:49:59
11 as to what is seen openly or privately?

12 A. Well, there's some things that I don't
13 want other people to know or see.

14 Q. Can you give me some examples of something
15 that you might not want someone else to know or 09:50:36
16 see?

17 A. Something I've looked up or a website I've
18 been to. An example would be a medium.

19 Q. What do you mean by "a medium"?

20 A. It's, like, it's searching -- 09:51:14
21 (Interruption in audio/video.)

22 THE COURT REPORTER: Could you repeat
23 that.

24 BY MS. CRAWFORD:

25 Q. Oh, okay. 09:51:20

THE COURT REPORTER: Could you please the
answer.

3 THE WITNESS: A medium or a psychic
4 website.

5 BY MS. CRAWFORD:

09:51:34

6 Q. And why is that?

7 A. Because I found that some people find it
8 offensive or I'm made to feel embarrassed about
9 looking into mediums or psychics.

10 Q. Okay. So then it seems as though what
11 you're saying, you know, that's information that
12 you wouldn't want other people necessarily knowing
13 about your online browsing activities; is that --
14 that a fair characterization?

09:52:07

15 A. That is what I'm saying.

09:52:21

16 Q. Do you take precautions to protect your
17 privacy while you're browsing the internet, for
18 example, to ensure that others wouldn't know
19 things about your activities online like, if you
20 were to visit the website of a psychic or a
21 medium?

09:52:40

22 MS. BAEZA: Objection. Form. Compound.

23 BY MS. CRAWFORD:

Q. You can answer.

25 A. Yes, I do take precautions.

09:52:50

1 Q. Can you identify those precautions for me.

2 A. I will put on a privacy -- I'll search
3 under a privacy setting.

4 Q. What do you mean by that; searching under
5 a privacy setting? 09:53:19

6 A. So I will search under -- I'll search in
7 incognito mode or I will search in private.

8 Q. Anything else you do?

9 A. I keep a password on my phone.

10 Q. Okay. Any other precautions you take to 09:53:52
11 ensure that your privacy is protected while you
12 browse the internet?

13 A. I delete my history.

14 Q. Tell me what you mean by that.

15 A. I will go back to a site I visited and 09:54:11
16 delete it or trash it from the screen.

17 Q. Okay. And when you say you "delete it,"
18 would you do that -- would you do those deletions
19 when you're in the private mode that you mentioned
20 entering just a moment ago? 09:54:37

21 A. Yes, I guess because it's not a document
22 and it can't really delete, so what I will do is,
23 I will I exit out is what I do.

24 Q. So just to make sure I -- I -- I
25 understand what -- what sort of process you 09:55:00

1 follow, you'll browse the web and then click out
2 of the browser window once you're done browsing to
3 ensure that there is no record, perhaps, of --
4 of -- of your visit to a specific site; is that
5 right? 09:55:21

6 A. That's right.

7 Q. Okay. Do you do anything -- actually, let
8 me ask.

9 Do you do that when you're both browsing
10 in private mode and a non-private mode? 09:55:34

11 A. It depends on what I am searching for. So
12 if it's something that I don't want anybody else
13 to see and I'm in private mode, I will exit the
14 window.

15 Q. And if you're searching for something that 09:55:58
16 you don't want someone to see when you're not in
17 private mode, would you follow the same practice?

18 A. Yes.

19 Q. Okay. Are there any other precautions --
20 oh, it looked like you were going to say 09:56:16
21 something. Were you --

22 A. No.

23 Q. -- not done answering the question? Okay.

24 A. No. Go on.

25 Q. Are there any other precautions that you 09:56:23

1 take when you're browsing the web to ensure your
2 activity remains private?

3 A. Those three precautions are mostly what
4 I -- mainly the precautions I take.

5 Q. Okay. Do you take any precautions to 09:56:54
6 protect your privacy while you're using apps as
7 distinct from web browsing?

8 A. While -- while I'm using apps?

9 Q. Yes.

10 A. I'll exit the screen.

11 Q. Okay. Anything else?

12 A. Not for -- I can't think of precautions on
13 apps. Let me see, actually...

14 That's it for now.

15 Q. And when you exit a screen on an app, for 09:58:03
16 example, is it to ensure that, let's say, you
17 know, someone using your phone wouldn't be able to
18 see what you were looking at or what you were, you
19 know -- what you were doing?

20 A. Yes, that's correct.

21 Q. Okay. Are you familiar with something
22 called a privacy policy?

23 I believe so, based on some of the
24 documents that you've looked at to prepare, but I
25 just want to confirm.

09:58:34

1 A. Yes, I'm familiar.

2 Q. And do you read privacy policies of the
3 companies whose websites you visit online?

4 A. Yes, I do.

5 Q. Okay. Is that an additional precaution 09:58:48
6 that you take, for example, reading the privacy
7 policies of the websites that you visit?

8 A. Yes.

9 Q. Would you say that you read the privacy
10 policies of most websites that you visit, some, or 09:59:06
11 none?

12 A. Most.

13 Q. Approximately how many times do you do
14 that in a given week?

15 A. In a given week, that's -- I read the 09:59:23
16 privacy policies when there's an initial account
17 setup or if there's an update.

18 Q. And how would you know whether there's an
19 update to a website's privacy policy?

20 A. I will receive an alert. 09:59:51

21 Q. Do you always -- do you know if you -- if
22 every website that you visit sends alerts when
23 their privacy policies are updated?

24 A. I don't know if every websites [sic] sends
25 a updated policy. 10:00:11